

# Community Services Block Grant (CSBG) State Plan Draft Version: No. 2 (8/12/2015)

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### Mandatory Grant Application SF-424

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## SECTION 1

### CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact, and Official State Designation Letter

- 1.1.** The following information is related to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act. The following information mirrors the information provided on the Application for Federal Assistance, SF-424M.
- 1.1a. Lead agency:** The West Virginia Office of Economic Opportunity (OEO) has been designated by the Governor, Earl Ray Tomblin of West Virginia to act as the lead agency for the administration of the Community Services Block Grant (CSBG).
  - 1.1b. Cabinet or administrative department of this lead agency:** Department of Commerce
  - 1.1c. Division, bureau, or office of the CSBG authorized official:** WV Office of Economic Opportunity
  - 1.1d. Authorized official of the lead agency:** Ms. Julie A. Alston
  - 1.1e. Street address:** 700 Washington St. East 4<sup>th</sup> Floor
  - 1.1f. City:** Charleston
  - 1.1g. State:** West Virginia
  - 1.1h. Zip:** 25301
  - 1.1i. Telephone number and extension:** 304-558-8860 x312
  - 1.1j. Fax number:** 304-558-4210
  - 1.1k. Email address:** Julie.A.Alston@wv.gov
  - 1.1l. Lead agency website:** <http://www.oeo.wv.gov>
- 1.2.** The following information is related to the designated State CSBG point of contact.
- 1.2a. Agency name:** WV Office of Economic Opportunity
  - 1.2b. Name of the point of contact:** Ms. Shelly Woda
  - 1.2c. Street address:** 700 Washington St. East, 4<sup>th</sup> Floor
  - 1.2d. City:** Charleston
  - 1.2e. State:** West Virginia
  - 1.2f. Zip:** 25301
  - 1.2g. Point of contact telephone number:** 304-558-8860 x329
  - 1.2h. Fax number:** 304-558-4210
  - 1.2i. Point of contact email address:** Shelly.J.Woda@wv.gov

**1.2j. Point of contact agency website:** <http://www.oeo.wv.gov>

**1.3. Designation Letter:** Attach the State's official CSBG designation letter. If either the governor or designated agency has changed, update the letter accordingly.

**Attachment 1.3 – Designation Letter from Governor of WV**

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## SECTION 2

### State Legislation and Regulation

- 2.1. CSBG State Legislation:** The State does not have a statute authorizing CSBG.
- 2.2. CSBG State Regulation:** The State does not have regulations for CSBG.
- 2.3.** N/A
- 2.4. State Authority:** Select a response for each question about the State statute and/or regulations authorizing CSBG:
- 2.4a.** The State legislature did not enact authorizing legislation, or amendments to an existing authorizing statute, last year.
  - 2.4b.** The State did not establish or amend regulations for CSBG last year.
  - 2.4c.** The State statutory or regulatory authority did not designate the bureau, division, or office in the State government that is to be the State administering agency.

## SECTION 3

### State Plan Development and Statewide Goals

**3.1. CSBG Lead Agency Mission and Responsibilities:** The Office of Economic Opportunity (OEO) ensures the integrity of programs by providing funding, training, technical assistance, and oversight for a statewide network of partners that increase economic opportunities for individuals, families, and communities in West Virginia.

**3.2. State Plan Goals:**

The goals of the State CSBG Office are:

1. To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the community services block grant program prepared in accordance with and containing the information described in Section 676 of the Act. ['675A(b)]
2. To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the community services block grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year.
3. To limit the amount of funds carried over to the succeeding fiscal year of an allocation.
4. To spend no less than 5 percent of the grant received under Section 675A or the State allotment received under section 675C(b)(1) for discretionary expenses.
5. To hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State plan. ['676(a)(2)(B)]
6. To promote the implementation of the National Organizational Standards, including; provision of training and resources to CEEs to complete an electronic Self-assessment
7. To review the Organizational Standards electronic Self-assessments annually and provide Technical Assistance Plans (TAPs) or Quality Improvement Plans(QIPs) for improvement.
8. To assure that all WV CSBG Eligible Entities meet 100% of the Organizational Standards by the end of FY2017.
9. To present a summary of the CSBG State Plan at an annual legislative hearing for block grants in the State of WV in accordance with ['676(a)(3)].
10. To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. ['676(e)(2)]
11. To provide timely communication to subrecipients and statewide partners on the administration of CSBG, including, communication of grant requirements and training and technical assistance opportunities.
12. To provide regular training opportunities on topics crucial to the successful implementation of CSBG, including at a minimum; CSBG Application training, Grant Agreement training, IS Report training, Grant Financial Tracking/Invoicing training, Organizational Standards training, ROMA training, and Community Needs Assessment training.

### **3.3. State Plan Development**

**3.3a.** The State analyzed internal policies including; CSBG Monitoring Procedures, Technical Assistance plan, past discretionary spending records, CSBG ROMA policies, established funding formula, hearing minutes, and eligible entity plans to develop this State Plan.

**3.3b.** The state consulted with eligible entities via webinar and the West Virginia Annual Training Conference as well as the State community action association for the development of this State Plan.

### **3.4. Eligible Entity Involvement**

**3.4a.** The State worked closely with eligible entities to develop state procedures for implementation of the Organizational Standards. Communication included discussions during Association meetings, a planning session with the Association, working closely with an eligible entity to pilot the self-assessment process and assist with the training process, and allow for comments on the State implementation policy. The State plans to work more closely with the eligible entities during the implementation of this State Plan by means of quarterly Executive Director meetings to involve the eligible entities in a greater capacity moving forward.

**3.4.b.** *If this is the first year filling out the automated State Plan, skip this question.*

**3.5.** *If this is the first year filling out the automated State Plan, skip this question.*

## SECTION 4

### CSBG Hearing Requirements

- 4.1. Public Inspection:** The State Plan was made available on the State office website ([www.oeo.wv.gov](http://www.oeo.wv.gov)) on August 5, 2015, and CSBG Eligible Entities were made aware of the posting.
- 4.2. Public Notice/Hearing:** The plan was made available two weeks prior to the hearing and the public was notified by ads in 8 major newspapers throughout the state. Ads were run for 3 consecutive days at least 2 weeks prior to the hearing.
- 4.3. Public and Legislative Hearings:**

Date	Location	Type of Hearing [Select an option]
1) August 19, 2015	1) 700 Washington St., East, 4 <sup>th</sup> Floor, Charleston, WV 25301	1) Public
2) January 14, 2015	2) 1900 Kanawha Blvd., East, Charleston, WV 25350	2) Legislative

- 4.4.** Minutes of the hearings are attached

**Attachment 4.4.a:** Public Hearing Minutes

**Attachment 4.4.b:** Legislative Hearing Minutes

## SECTION 5

### CSBG Eligible Entities

#### 5.1. CSBG Eligible Entities:

CSBG Eligible Entity	Public or Nonprofit	Type of Entity (choose all that apply)	Geographical Area Served by county (Provide all counties)	Brief Description of "Other"
Central WV Community Action Association, Inc.	Nonprofit	Community Action Agency	(2) Lewis, Harrison	N/A
CHANGE, Inc.	Nonprofit	Community Action Agency	(4) Brooke, Hancock, Marshall, Ohio	N/A
Coalfield Community Action Partnership, Inc.	Nonprofit	Community Action Agency	(1) Mingo	N/A
Community Action of South Eastern West Virginia, Inc.	Nonprofit	Community Action Agency	(3) Mercer, Monroe, Summers	N/A
Community Resources, Inc.	Nonprofit	Community Action Agency	(11) Calhoun, Doddridge, Gilmer, Jackson, Pleasants, Ritchie, Roane, Tyler, Wetzels, Wirt, Wood	N/A
Council of the Southern Mountains, Inc.	Nonprofit	Community Action Agency	(1) McDowell	N/A
Eastern WV Community Action Agency, Inc.	Nonprofit	Community Action Agency	(6) Grant, Hampshire, Hardy, Mineral, Morgan, Pendleton	N/A
EnAct, Inc.	Nonprofit	Community Action Agency	(5) Boone, Clay, Fayette, Kanawha, Putnam	N/A
Mountain CAP of West Virginia, Inc.	Nonprofit	Community Action Agency	(3) Braxton, Upshur, Webster	N/A
MountainHeart Community Services, Inc.	Nonprofit	Community Action Agency	(1) Wyoming	N/A
Nicholas Community Action Partnership, Inc.	Nonprofit	Community Action Agency	(1) Nicholas	N/A
North Central WV Community Action Association, Inc.	Nonprofit	Community Action Agency	(9) Barbour, Greenbrier, Marion, Monongalia, Pocahontas, Preston, Randolph, Taylor, Tucker	N/A
PRIDE Community Services, Inc.	Nonprofit	Community Action Agency	(1) Logan	N/A
Raleigh County Community Action Association, Inc.	Nonprofit	Community Action Agency	(1) Raleigh	N/A
Southwestern Community Action Council, Inc.	Nonprofit	Community Action Agency	(4) Cabell, Lincoln, Mason, Wayne	N/A
Telamon Corporation	Nonprofit	Community Action Agency	(2) Berkeley, Jefferson	N/A

#### 5.2. Total number of CSBG eligible entities: 16

#### 5.3. Changes to Eligible Entities List: There have been no changes to the list of eligible entities since the last State Plan submitted for FY2014-2015.



## SECTION 6

### Organizational Standards for Eligible Entities

**Note:** Reference IM 138, *State Establishment of Organizational Standards for CSBG Eligible Entities*, for more information on Organizational Standards. Click [HERE](#) for IM 138.

- 6.1. Choice of Standards:** The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138).
- 6.2.** The State is using the COE-developed organizational standards and does not propose making a minor modification to the standards, as described in IM 138.
- 6.2a.** N/A
- 6.3.** The State has officially adopted organizational standards for eligible entities in the State through the distribution of a State Information Memorandum. Compliance with the Organizational Standards will also be a requirement of the CSBG grant agreement between the State and Subrecipients.
- 6.4.** The State plans to utilize eligible entity self-assessment with validation by the State on an annual basis as described in IM 138.
- 6.4a. Description of the assessment process:** The State (OEO) is responsible for assessing the status of standards among all of the eligible entities annually and for reporting to OCS on the standards in the CSBG Annual Report beginning in FY2016. Beginning in FY2015, eligible entities will complete an electronic self-assessment by September 30, 2015. This assessment will serve as a practice assessment and to evaluate potential training needs across the state to be the focus of state training in FY2016. OEO will work with the WV Community Action Partnership, Inc. to develop timely and effective trainings to address common training needs among all eligible entities.
- Beginning in FY2016, OEO will establish a schedule to review and verify eligible entities' electronic assessment of standards once per program year through an OEO desk review process. Eligible entities must update their electronic assessments no less than annually to ensure a fair desk review process by OEO.
- OEO is responsible for ensuring that all eligible entities meet all organizational standards. Some standards may take several years for eligible entities to meet, but every entity must make steady progress toward the goal of meeting all standards.
- 6.5.** The State will not make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138.
- 6.5a.** N/A
- 6.6. *If this is the first year filling out the automated State Plan, skip this question.***

## SECTION 7

### State Use of Funds

#### Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

**7.1 Formula:** The State utilizes the method (formula) known as “Base + Formula” for allocating CSBG funds to eligible entities.

**7.1a.** The State statutory or regulatory authority does not specify the terms or formula for allocating the 90 percent funds among eligible entities.

**7.2. Planned Allocation:** The following table indicates the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars.

Planned CSBG 90 Percent Funds		
CSBG Eligible Entity	Year One	Year Two
	Funding Amount \$	Funding Amount \$
Central WV Community Action Association, Inc.	\$ 366,314	\$ 366,314
CHANGE, Inc.	\$ 440,162	\$ 440,162
Coalfield Community Action Partnership, Inc.	\$ 229,539	\$ 229,539
Community Action of South Eastern West Virginia, Inc.	\$ 402,072	\$ 402,072
Community Resources, Inc.	\$ 692,870	\$ 692,870
Council of the Southern Mountains, Inc.	\$ 254,228	\$ 254,228
Eastern WV Community Action Agency, Inc.	\$ 377,491	\$ 377,491
EnAct, Inc.	\$ 810,502	\$ 810,502
Mountain CAP of West Virginia, Inc.	\$ 295,388	\$ 295,388
MountainHeart Community Services, Inc.	\$ 209,402	\$ 209,402
Nicholas Community Action Partnership, Inc.	\$ 218,938	\$ 218,938
North Central WV Community Action Association, Inc.	\$ 862,747	\$ 862,747
PRIDE Community Services, Inc.	\$ 250,339	\$ 250,339
Raleigh County Community Action Association, Inc.	\$ 232,040	\$ 232,040
Southwestern Community Action Council, Inc.	\$ 658,664	\$ 658,664
Telamon Corporation	\$ 365,942	\$ 365,942
<b>TOTALS</b>	<b>\$6,757,639</b>	<b>\$6,757,639</b>

**7.3. Distribution Process:** Ninety percent (90%) of the CSBG funds allotted to the State will be allocated to CSBG eligible entities based on the established formula. CEEs will have 30 days to complete and submit their application. OEO will then review applications for completeness within 30 days. Once a CEE's application is approved, OEO will issue a Grant Agreement and award notification to the CEE based on the level of funding received from ACF at that time. Typically, it will be a first quarter award. OEO will not permit an entity to spend multiple allotments simultaneously. The distribution formula will be updated as new poverty data becomes available.

**7.4. Distribution Timeframe:** West Virginia operates its CSBG program on a calendar year of January 1 through December 31. CEE's CSBG Budgets are based on a 12 month grant period. Due to the uncertainty of when Federal awards will be received, this method allows the eligible entities to better plan program expenditures, and allows for consistent grant start dates from year to year. To ensure all funds are expended by the program completion date, OEO works closely with agencies that are still spending carry-over funds after the 12<sup>th</sup> month of program operations. If needed, OEO will approve a

formal request from an eligible entity to extend the period of the grant beyond 12 months. Extensions will be granted in 3 month increments until all funds are spent. If an extension is needed, an agency must request a no-cost, time extension in the 11<sup>th</sup> month of the current program year in order to carry-over funds.

**7.5. If this is the first year filling out the automated State Plan, skip this question.**

**Administrative Funds** [Section 675C(b)(2) of the CSBG Act]

**7.6.** The State plans to allocate 5% of State CSBG funds for administrative activities, under this State Plan.

**7.7.** 13 State staff positions will be funded in whole or in part with CSBG funds under this State Plan.

**7.8.** 5.0 State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan.

**Remainder/Discretionary Funds** [Section 675C(b) of the CSBG Act]

**7.9.** The State plans to use remainder/discretionary funds as follows:

<b>Use of Remainder/Discretionary Funds</b>			
<b>Remainder/ Discretionary Fund Uses</b> (See 675C(b)(1) of the CSBG Act)	<b>Year One</b>	<b>Year Two</b>	<b>Brief description of services/activities</b>
	<b>Planned \$</b>	<b>Planned \$</b>	
a. Training/technical assistance to eligible entities	\$160,000	\$160,000	See item 8.1
b. Coordination of State-operated programs and/or local programs	\$50,000	\$50,000	See section 9, State Linkages and Communication.
c. Statewide coordination and communication among eligible entities	\$50,000	\$50,000	See section 9, State Linkages and Communication.
d. Analysis of distribution of CSBG funds to determine if targeting greatest need			
e. Asset-building programs			
f. Innovative programs/activities by eligible entities or other neighborhood groups	\$65,500	\$65,500	See Attachment 7.9f
g. State charity tax credits			
h. Other activities, specify _____	\$50,000	\$50,000	Statewide Data System
<b>Totals</b>	<b>\$375,500</b>	<b>\$375,500</b>	

**Attachment 7.9f: "FY2016-2017 Discretionary Grant Application for Innovative Programs/Activities by Eligible Entities"**

**7.10.** The State plans to work with CSBG eligible entities, the WV Community Action Partnership, the WV Coalition to End Homelessness, DBA Technologies (software provider), and National technical assistance providers to carry out some or all of the activities in table 7.9.

**7.11 If this is the first year filling out the automated State Plan, skip this question.**

## SECTION 8

### State Training and Technical Assistance

- 8.1.** The State's plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan is outlined in the table below.

Training and Technical Assistance			
Fiscal Year (FY) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
FY1 - Q1	Training	Other	Community Action Plan as part of annual Grant Application
FY1 - Q1	Training	Other	National Performance Indicator Targeting
FY1 - Q2	Training	Reporting	IS Report Training
FY1 - Q2	Training	Other	Support for attendance to NASCSP CSBG Orientation
FY1 - Q3	Technical Assistance	Organizational Standards - for eligible entities with unmet standards	
FY1 - Q3	Training	Other	Support for attendance to CAPLAW Conference
FY1 - Q4	Training	Monitoring	
Y2 - Q1	Training	Other	Community Action Plan as part of annual Grant Application
Y1 - Q1	Training	Other	National Performance Indicator Targeting
FY2 - Q2	Training	Reporting	IS Report Training
FY2 - Q2	Training	Other	Support for attendance to NASCSP CSBG Orientation
Y2 - Q3	Technical Assistance	Organizational Standards - for eligible entities with unmet standards	
Y2 - Q4	Training	Monitoring	

- 8.1a.** The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): \$160,000 [Prepopulated with the budget allocation for years one and two under 7.9a]

- 8.2.** *If this is the implementation year for organizational standards, skip this question.*
- 8.3.** The State plans to provide training and/or technical assistance as described in item 8.1 directly and through partnership with the West Virginia Community Action Partnership, and national technical assistance provider(s) including NASCSP and CAPLAW.
- 8.4.** *If this is the first year filling out the automated State Plan, skip this question.*

## SECTION 9

### State Linkages and Communication

**Note:** This section describes activities that the State may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The State may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

- 9.1. State Linkages and Coordination at the State Level:** The State plans to create or maintain partnerships to ensure increased access to CSBG services to low-income people and communities under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). The Office of Economic Opportunity administers CSBG which also administers the Weatherization Assistance Program, Emergency Solutions Grant program, and the Housing Opportunities for Persons with AIDS program. OEO partners with the WV Department of Health and Human Resources (DHHR) for the LIHEAP non-emergency applications, and LIHEAP weatherization funding, as well as the WV Division of Energy and the WV Workforce Development Office. OEO also participates in the WV Interagency Council on Homelessness that is made up of critical partners across the state including OEO that works to address common barriers to housing with a focus on ending homelessness in WV.
- 9.2. State Linkages and Coordination at the Local Level:** Describe the linkages and coordination at the local level that the State plans to create or maintain partnerships with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). The state maintains an active partnership with the West Virginia Community Action Partnership, the West Virginia Coalition to End Homelessness. The state office is in the beginning stages of a partnership with the state WIOA committee, and will work to provide more opportunities for CEEs to participate in WIOA programs on a local level. The State also participates on an HMIS (Homeless Management Information System) steering committee made up of representatives from all four WV Continuums of Care, and a representative from the State CSBG/ESG office to promote collaboration and data sharing.
- 9.3. Eligible Entity Linkages and Coordination**
- 9.3a State Assurance of Eligible Entity Linkages and Coordination:** The State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or “one stop” service centers to meet the many needs of the clients seeking services. Eligible entities partner with other public and private resources to provide a complete range of services for individuals, families, and communities. In Fiscal Year 2014, the eligible entities reported leveraging a total of \$89,402,427 non-Community Service Block Grant Funds to meet identified community needs.
- 9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps:** The eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. Through linkages established within the service area

individuals and families can be connected to an array of local programs and services to meet the needs of family members. A condition of continued receipt of CSBG funds each year is the submission of an annual CSBG Application which includes information on programs which assist low-income individuals and includes the entities follow-up mechanisms. CSBG eligible entities are encouraged to provide appropriate case management services including an assessment of the household's needs and a plan of action to meet the needs and regular follow-up to ensure that clients are making progress in meeting established goals. Each CSBG eligible entity includes a description of how the entity coordinates and mobilizes public and private resources to effect maximum leveraging for CSBG funds (ROMA Goal 4: Partnerships among supporters and providers of service to low-income people are achieved, and ROMA Goal 5: Agencies increase their capacity to achieve results). CSBG funds provide the underpinning which enable CSBG eligible entities to operate an array of anti-poverty and social service programs. Coordination of public and private funding takes place at the local level in a variety of ways suited to the individual community and available resources. CSBG eligible entity staff and/or administrators meet with other providers in the service area to determine how best to not duplicate services while providing the services needed to meet the emergency needs of low-income persons and establishing/improving programs which assist low-income persons to transition out of poverty.

#### **9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities:**

The State does not intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act.

##### **9.4a** N/A

**9.4b.** The State plans to partner with the WIOA office for the coordination of employment and training activities, as defined in Section 3 of WIOA, by the State and by eligible entities providing activities through the WIOA system. Under the WIA program WV law established an Interagency Collaborative Team comprised of the mandated partners under WIA. The state is continuing the group through WIOA. OEO has reached out to this group to participate and present information about CSBG and how the programs can work together to improve employment outcomes and training activities in the State of WV. This process is in the very early stages of implementation. The state office will continue to participate and educate the partners about the activities and purposes of CSBG. The state will also encourage CEEs to take a more active role in their local WIOA offices

**9.5. Emergency Energy Crisis Intervention:** The State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act). The State CSBG office is not the direct recipient of LIHEAP funding. The WV Department of Health and Human Resources (DHHR) Low-Income Home Energy Assistance Program (LIHEAP) allows West Virginia Weatherization Assistance Program Sub-recipients the administration of an Energy Crisis Intervention Program (ECIP). The ECIP program is designed to aid households in need of emergency heat due to non-existent, non-operable, severely malfunctioning, unsafe, or severely inadequate heat during the winter months, from November 1 to March 15.

**9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:** The State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations,

according to the State's assurance under Section 676(b)(9) of the CSBG Act. Eligible entities are required to submit an application that includes a community action plan. The plan must include information on how the CEE coordinates programs with and forms partnerships with other organizations serving low-income residents of the communities, including religious organizations, charitable groups, and community organizations. The state reviews MOUs/partnership agreements during regular on-site monitoring and checks for partnerships on the annual IS Report.

**9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:** The eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act. CSBG eligible entities operate within a network of local service providers to reduce duplication of effort and to coordinate resources to address various client circumstances. CSBG eligible entities have developed extensive information and referral networks and/or "one stop" service centers to meet the many needs of the clients seeking services. Through linkages established within the service area individuals and families can be connected to an array of local programs and services to meet the needs of family members.

**9.8. Coordination among Eligible Entities and State Community Action Association:** The State supports coordination among the eligible entities and the State Community Action Association by funding the Association with CSBG discretionary funding. The funding provides support for Community Action initiatives and training. The association is the lead agency for ROMA training in the state. Within the year, 11 of 16 CEEs will have a certified ROMA trainer on staff. This has been a significant effort and demonstration of partnership between the state office and association. The state office provides program updates for all association board meetings, and is available to attend if requested.

**9.9 Communication with Eligible Entities and the State Community Action Association:** The State's plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan is outlined in the table below.

Communication Plan			
Topic	Expected Frequency	Format (drop down)	Brief Description of "Other"
Communication from OCS including Dear Colleague Letters and IMs	Other	Email	Will be distributed asap after receipt from OCS
CSBG Program Updates	Quarterly	Email	
State Plan	Annually	Email, Website, and Other	Presented in an annual hearing and legislative hearing
Organizational Standards	Semi-Annually	Email, Website, Meetings/Presentations	
CSBG Application	Annually	Email, Meeting/Presentation	
Notice of Training Opportunities pertaining to Community Action	Monthly	Email	
Eligible entity Exec. Director meetings	Quarterly	Meeting/Presentation	
Program Report to WVCAP Association Board meeting	Bi-Monthly	Email	

**9.10. Feedback to Eligible Entities and State Community Action Association:** The State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures as part of quarterly CSBG eligible entity executive director meetings.

**9.11 If this is the first year filling out the automated State Plan, skip this question.**

## SECTION 10

### Monitoring, Corrective Action, and Fiscal Controls

#### Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

- 10.1.** The following is the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)	Brief Description of "Other"
Central WV Community Action Association, Inc.	Full Onsite Other	FY2 Q1	April 14-15, 2014	Annual fiscal review
CHANGE, Inc.	Full Onsite Other	FY1 Q3	July 8-10, 2013	Annual fiscal review
Coalfield Community Action Partnership, Inc.	Full Onsite Other	FY1 Q3	Sept 16-18, 2013	Annual fiscal review
Community Action of South Eastern West Virginia, Inc.	Full Onsite Other	FY1 Q4	Oct 21-23, 2013	Annual fiscal review
Community Resources, Inc.	Full Onsite Other	FY2 Q3	Sept 1-3, 2014	Annual fiscal review
Council of the Southern Mountains, Inc.	Full Onsite Other	FY2 Q4	Oct 20-21, 2014	Annual fiscal review
Eastern WV Community Action Agency, Inc.	Full Onsite Other	FY2 Q4	Sept 22-24, 2014	Annual fiscal review
EnAct, Inc.	Full Onsite Other	FY1 Q3	May 26-27, 2015	Annual fiscal review
Mountain CAP of West Virginia, Inc.	Full Onsite Other		Aug 5-6, 2015	Annual fiscal review
MountainHeart Community Services, Inc.	Full Onsite Other	FY2 Q3	June 9-11, 2015	Annual fiscal review
Nicholas Community Action Partnership, Inc.	Full Onsite Other	FY1 Q1	Apr 22-25, 2013	Annual fiscal review
North Central WV Community Action Association, Inc.	Other		Feb 19-21, 2013	Annual fiscal review
PRIDE Community Services, Inc.	Full Onsite Other	FY1 Q1	Apr 1-3, 2013	Annual fiscal review
Raleigh County Community Action Association, Inc.	Other		Jun 16-17, 2015	Annual fiscal review
Southwestern Community Action Council, Inc.	Full Onsite Other	FY2 Q3	Jun 22-24, 2015	Annual fiscal review
Telamon Corporation	Other			Annual fiscal review

- 10.2. Monitoring Policies:** A copy of the State monitoring policies is attached.

**Attachment 10.2:** CSBG IM 2015-5 "State CSBG Monitoring Policies"

- 10.3. Initial Monitoring Reports:** According to the State's procedures, the State will disseminate initial monitoring reports to local entities within 60 days of the conclusion of on-site monitoring.



## **Corrective Action, Termination and Reduction of Funding and Assurance Requirements (Section 678C of the Act)**

**10.4. Closing Findings:** State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings are included in the State monitoring protocols attached above.

**10.4a.** N/A

**10.5. Quality Improvement Plans (QIPs):** 1 eligible entity is currently on a Quality Improvement Plan.

**10.6. Reporting of QIPs:** The state CSBG Administrator will notify its regional OCS representative of the QIP by email with 30 days of approving the QIP. The state will provide a copy of the QIP to the representative and provide additional information if requested.

**10.7. Assurance on Funding Reduction or Termination:** The State assures, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).”

## **Policies on Eligible Entity Designation, De-designation, and Re-designation**

**10.8.** The State CSBG statute and/or regulations does not provide for the designation of new eligible entities?

**10.8a.** In the event that the State terminates the designation of an organization as an eligible entity, or otherwise reduces funds, any resulting funding may be awarded only to an organization that is an eligible entity for CSBG funds. Section 676A of the CSBG Act outlines procedures for designation and re-designation of eligible entities in un-served areas. In accordance with the CSBG Act, a State may solicit applications and designate as an eligible entity either:

- A private nonprofit organization that is geographically located in the un-served area that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency and meets the requirements of the CSBG Act; or
- A private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the un-served area and is already providing related services in the un-served area.

States must grant the designation to an organization of demonstrated effectiveness in meeting the goals of the CSBG Act, and may give priority to an eligible entity in a contiguous area that is already providing related services in the un-served area. If no private, nonprofit organization is identified or determined to be qualified as an eligible entity to serve the area, the State may designate an appropriate political subdivision of the State to serve as an eligible entity for the area.

Any nonprofit or public agency receiving CSBG funds must meet the tripartite board requirements specified in Section 676B of the CSBG Act. The process of soliciting applications to select a new eligible entity may take place during the period in which the Department of Health and Human Services is reviewing a State decision to terminate an organization’s eligibility for CSBG funds. However, the State may not award the funds to a new eligible entity

until the Department confirms the State's finding for cause or the 90-day period for Federal review has passed.

**10.9.** The State CSBG statute and/or regulations does not provide for de-designation of eligible entities?

**10.9a.** The State will follow the requirements of the CSBG Act for de-designation of eligible entities and adhere to the guidance in CSBG IM 116. The state also recognized the importance of further defining the procedures for de-designation and aims to establish detailed procedures during the period covered by this application.

**10.10.** The State CSBG statute and/or regulations does not specify a process the State CSBG agency must follow to re-designate an existing eligible entity?

**10.10a.** The State will follow the requirements of the CSBG Act for re-designation of eligible entities and adhere to the guidance in CSBG IM 116. The state also recognized the importance of further defining the procedures for de-designation and aims to establish detailed procedures during the period covered by this application.

### **Fiscal Controls and Audits and Cooperation Assurance**

**10.11. Fiscal Controls and Accounting:** The State has established appropriate fiscal controls and accounting procedures that permit the accurate and timely preparation of the SF-425. Multiple reports are run from the State's accounting system (wvOasis). The information contained in these reports is used to prepare an initial SF-425. The SF-425 is then reconciled and reviewed before submission. Additionally, OEO ensures staff possesses the required skills and knowledge necessary to prepare the SF-425. An office-wide operational calendar is also maintained with report deadlines.

To permit the tracing of expenditure adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96361(a), the State conducts annual Fiscal Monitoring of eligible entities during which reported eligible entity expenditures are tested for allowability and internal controls and financial management systems are assessed.

**10.12. Single Audit Management Decisions:** Applicable to CSBG at 45 CFR 75.521, Subrecipient single audits are due to OEO within 9 months of the end of the Subrecipients' fiscal year. If the deadline is not met, OEO sends the Subrecipient a reminder notice and extension request form via mail. Once a Subrecipient submits an extension request using the, OEO will review for approval or disapproval. This form will be signed by an OEO authorized employee and emailed to the Subrecipient Executive Director.

OEO will verify when the audit was submitted to the Federal Clearinghouse, and note this on the "Annual Audit Chart", maintained by the Fiscal Compliance Monitor. If the audit has not been submitted to the Federal Clearinghouse, OEO will send a reminder notice before reviewing the audit.

The fiscal compliance monitor will review all audits using the "OEO Subrecipient Audit Review Checklist." A "Subrecipient Audit Review Summary" is completed for the audit, and maintained on OEO's shared drive. Depending on the results of the review, OEO forwards to the Subrecipient either (1) a letter indicating acceptance of the audit package or (2) a letter issuing a management decision and requesting a Corrective Action Plan. The Subrecipient has 6 weeks to submit a CAP if applicable.

If a Subrecipient has not submitted the Corrective Action Plan within the deadline, the Corrective Action Plan "Reminder Email" will be forwarded to the Executive Director. Upon receipt of the Corrective

Action Plan, OEO will review and send to the Subrecipient either an acceptance notice or another correspondence requesting modification to the Corrective Action Plan.

**10.13. Assurance on Federal Investigations:** The State will permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act?

**10.14. *If this is the first year filling out the automated State Plan, skip this question.***

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## SECTION 11

### Eligible Entity Tripartite Board

- 11.1.** The following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act. The State will review copies of Board meeting minutes, track Board vacancies/composition, and review bylaws to ensure that the procedures for filling board positions meet the requirement and intent of the CSBG Act. Eligible entities are required to include Board documents in the statewide data system that is reviewed in conjunction with regular on-site monitoring and in conjunction with training.
- 11.2.** The State requires eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards by utilization of a board tracking data system where CEEs maintain current board information including; board member profiles, board meeting records including the attachment of minutes after approved, board composition, bylaws, board training hours, and volunteer reporting.
- 11.3. Assurance on Eligible Entity Tripartite Board Representation:** The State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board. The State will review the eligible entities policies and procedures during regular on-site monitoring. This assurance is included as part of the programmatic assurances the CEE agrees to in the grant agreement.
- 11.4.** The State does not permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act.

**11.4a.** N/A

## Section 12

### Individual and Community Income Eligibility Requirements

**12.1. Required Income Eligibility:** The income eligibility threshold for direct CSBG services in the State of West Virginia will be 125% of the HHS poverty line.

**12.1a.** To be eligible for CSBG services, clients must be at or below 125% of the federal poverty line as determined by the federal Office of Management and Budget based on the most recent federal Census data and as revised annually (or more frequently) by the U.S. Department of Health and Human Services (the HHS poverty guidelines). Eligible entities should use the most current HHS poverty guidelines when assessing income eligibility. The current guidelines are published in the Federal Register and are available on the HHS website [www.hhs.gov](http://www.hhs.gov). The guidelines are calculated on a sliding scale based on the number of persons in a client's family and will be automatically calculated when the household income is entered into the statewide data solution.

The State plans to develop specific guidance on how to calculate a client's income for the purpose of determining client eligibility for CSBG services or benefits.

**12.2. Income Eligibility for General/Short Term Services:** At this time the State does not address how it ensures eligible entities generally verify income eligibility for services with limited in-take procedures (where individual income verification is not possible or practical). The State plans to develop guidance in this area during the period of this plan.

**12.3. Community-targeted Services:** At this time the State does not address how it ensures eligible entities' services target and benefit low-income communities for services that provide a community-wide benefit. The State plans to develop guidance in this area during the period of this plan.

## SECTION 13

### Results Oriented Management and Accountability (ROMA) System

**13.1. ROMA Participation:** The State and all eligible entities will participate in The Results Oriented Management and Accountability (ROMA) performance measurement system, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act.

**13.1a.** The CEE certifies that all activities carried out with funds provided under the Grant Agreement shall report on each of the six national Results Oriented Management and Accountability (ROMA) goals and applicable outcome indicators as defined in the WV Outcome Framework. The ROMA System is woven into the entire design of the CSBG program in WV; from submission of annual grant applications by CEEs, to consistent data entry, documentation of services and outcomes, and regular reporting.

The State is partnering with the WV Community Action Partnership to lead a new state ROMA Task Force designated to guide the direction of ROMA implementation among WV CSBG eligible entities (CEEs). The Task Force is made up of Nationally Certified ROMA Trainers (NCRTs) and NCRT candidates working to become trainers. Currently, 11 of 16 CEEs are represented on the Task Force. The State office has 2 NCRTs and the Association has 2 NCRTs that are also on the Task Force.

See Attachment “WV IM\_2015-5\_ROMA Implementation Policy” for more information.

**Attachment 13.1a:** CSBG IM 2015-6 “ROMA Implementation Policy”

**13.1b.** N/A

**13.2.** The State of WV will utilize the CSBG National Performance Indicators and additional WV Indicators to track eligible entity performance in promoting self-sufficiency, family stability, community revitalization, and agency capacity as required under Section 676(b)(12) of the CSBG Act. The Sub-recipient shall report all agency-wide unduplicated customer and household characteristics, demographics and outcome/indicator data in DBA FACS Pro™. Data quality assurance measures and goals will be added to the Grantee monitoring and performance review of all Sub-recipients receiving CSBG funding.

The Sub-recipient shall provide on a quarterly basis, timely, complete and accurate CSBG Information Survey (hereafter “IS”) data via DBA FACS Pro™. Data to be provided specifically is unduplicated customer and household characteristics and demographics as indicated in Section G of the IS; customer outcome/indicator projected and actual data.

The Sub-recipient shall report unduplicated household characteristics and demographics, outcomes and indicators for all programs and services, not only those supported by CSBG. (ROMA Goals 1 and 6)

**13.3.** The State supports the eligible entities in using the ROMA system by having 2 certified ROMA trainers on staff to provide ROMA training and technical assistance when needed. The state also utilized a portion of the 5% CSBG discretionary funding to provide a statewide database system to the network that has been designed to function within the ROMA system; including the use of Logic Models, Scales and Matrices, tracking of services and results, planning and evaluation tools. The state provides regular training on the use of the data system. The state has also formed a ROMA task force in cooperation with the WV Community Action Partnership that focuses on improving the ROMA system in the state for all CEEs and guiding state policy related to the ROMA system.

**13.4. Eligible Entity Use of Data:** As part of the CSBG Application for funding a community action plan is submitted that requires CEEs to report on their programs and where improvements need to be made. This in combination with submission of ROMA Logic Models that provide data that is critical to a plan for improvement. The State mandates the use of an electronic statewide data reporting system that is a valuable resource of data. The system is equipped to produce regular grant reporting as well as ad hoc reporting of any data point entered into the system. The state also recognizes that more oversight and work needs to be done to ensure that this process takes place on a local and state level.

### **Community Action Plans and Needs Assessments**

**13.5.** The State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act. A Community Action Plan is required as part of the annual application for funding. The state has developed a template that CEEs can use to present their plan. To satisfy this requirement, the State requires detailed information on each eligible entity program/initiative that meets the service delivery goals of the entity and the Community Services Block Grant assurances. Eligible entities are required to complete the following outline for each program/initiative.

1. Agency Program Name:

- A. Primary Funding: Includes the primary source of funds dedicated to this program and the amount.
- B. CSBG funding: Includes the amount of 2015 CSBG funds allocated to this program. If carryover is being allocated to this program, it must be indicated.
- C. Additional funding: Includes any additional funding sources dedicated to the program and the amount allocated for each source.
- D. Projected # of Participants: Includes the number of participants expected to enroll in the program.
- E. CSBG Service Category: Employment | Education | Income Mgt. | Health | Housing | Linkages | Emergency Services | Nutrition | Self-Sufficiency | Other
- F. Demographic Category: Youth | Senior | N/A
- G. Counties Served: Includes each county served by this program.
- H. Eligibility Requirements: Includes the eligibility requirements for participants to receive services? (Example: Household income required to be less than 125% of poverty; household cannot receive greater than \$100 in emergency assistance per year, etc.)
- I. Narrative response to determine if the program addresses a need identified in the entity's most recent Community Assessment? Includes why the agency is providing this program to the community. If the need was not identified in the recent Community Assessment, an explanation is required.
- J. Includes the goals of the program/initiative? If this is a recurring program, explains how the goals of the previous program year were or were not met.
- K. If the goals were not met, the plan includes the entity's plans to ensure that goals are met for the plan year?
- L. Includes any organizations the entity is partnering with to provide the services and includes the primary focus of the partnership and whether or not a formal agreement exists.

**13.6. State Assurance:** The State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act. The state requires the submission of a Certification of Needs Assessment form as part of the application for CSBG funding to ensure that the assessment has been completed as well as the method of doing so. The full assessment is reviewed during regular on-site monitoring of the CEE.

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## SECTION 14

### CSBG Programmatic Assurances and Information Narrative (Section 676(b) of the CSBG Act)

#### 14.1 Use of Funds Supporting Local Activities

##### *CSBG Services*

**14.1a. 676(b)(1)(A):** The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(A) of the CSBG Act. As part of the Grant Agreement between the state and CSBG eligible entity, "funds made available through grant or allotment will be used –

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--
  - (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) to secure and retain meaningful employment;
  - (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
  - (iv) to make better use of available income;
  - (v) to obtain and maintain adequate housing and a suitable living environment;
  - (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
  - (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
    - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
    - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

##### *Needs of Youth*

**14.1b. 676(b)(1)(B)** The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(B) of the CSBG Act. As part of the Grant Agreement between the state and CSBG eligible entity, "funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of

youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
- (ii) after-school child care programs;

### ***Coordination of Other Programs***

**14.1c. 676(b)(1)(C)** The State reviews eligible entities' annual grant applications to assure that support activities are designed to meet the requirements outlined in section 676(b)(1)(C) of the CSBG Act. As part of the Grant Agreement between the state and CSBG eligible entity, 'funds made available through grant or allotment will be used –

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

### **State Use of Discretionary Funds**

**14.2 676(b)(2)** See items 7.9 and 7.10 for a description of how “the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

### **Eligible Entity Service Delivery, Coordination, and Innovation**

**14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

#### ***Eligible Entity Service Delivery System***

**14.3a. 676(b)(3)(A)** Each eligible entity in West Virginia provides a unique “service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;” and describes that system in their annual CSBG application through the completion of a comprehensive community action plan along with supporting ROMA logic models. Each entity has the ability to tailor their service delivery system to the needs of the local community.

#### ***Eligible Entity Linkages – Approach to Filling Service Gaps***

**14.3b. 676(b)(3)(B)** See item 9.3b for a description of “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow up consultations.”

### ***Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources***

**14.3c. 676(b)(3)(C)** See item 9.7 for a description of how “funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

***Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility***

**14.3d. 676(b)(3)(D)** The State reviews eligible entities’ annual grant applications to assure that “The local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging parenting.”

**Note:** The description above is about eligible entity use of 90 percent funds to support these initiatives. States may also support these types of activities at the local level using State remainder/discretionary funds, allowable under Section 675C(b)(1)(F). In this State Plan, the State indicates funds allocated for these activities under item 7.9(f).

**Eligible Entity Emergency Food and Nutrition Services**

**14.4. 676(b)(4)** The State reviews eligible entities’ annual CSBG applications to assure that “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.” Where entities are not providing direct services, they are to explain how they partner with other providers in the community to meet the need on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

**State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities**

**14.5. 676(b)(5)** As described in items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b, the State provides “an assurance that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

**State Coordination/Linkages and Low-income Home Energy Assistance**

**14.6. 676(b)(6)** As described in items 9.2 and 9.5, the State provides “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

**Federal Investigations**

**14.7. 676(b)(7)** As described in item 10.13, the State assures that “the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

## **Funding Reduction or Termination**

- 14.8. 676(b)(8)** As described in item 10.7, the State provides “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

## **Coordination with Faith-based Organizations, Charitable Groups, Community Organizations**

- 14.9. 676(b)(9)** As described in item 9.6, the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

## **Eligible Entity Tripartite Board Representation**

- 14.10. 676(b)(10)** As described in item 11.3, “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

## **Eligible Entity Community Action Plans and Community Needs Assessments**

- 14.11. 676(b)(11)** As described in items 13.5 and 13.6, the State provides “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

## **State and Eligible Entity Performance Measurement: ROMA or Alternate system**

- 14.12. 676(b)(12)** As described in items 13.1, 13.2, 13.3 and 13.4, the State provides “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

## **Validation for CSBG Eligible Entity Programmatic Narrative Sections**

- 14.13. 676(b)(13)** The State provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan, which are included as hyperlinks in section

14 to assure that there is “information describing how the State will carry out the assurances described in this section.”

**By signing here, the State CSBG authorized official is certifying the assurances set out above.**

\_\_\_\_\_  
Julie A. Alston  
West Virginia Office of Economic Opportunity

\_\_\_\_\_  
Date

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## SECTION 15

### Federal Certifications

#### 15.1 Lobbying

##### ***Certification for Contracts, Grants, Loans, and Cooperative Agreements***

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

##### ***Statement for Loan Guarantees and Loan Insurance***

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

☐ By checking this box, the State CSBG authorized official is providing the certification set out above.

## 15.2 Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645 (a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

### ***Certification Regarding Drug-Free Workplace Requirements*** (Instructions for Certification)

- (1) By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
- (2) The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (3) For grantees other than individuals, Alternate I applies.
- (4) For grantees who are individuals, Alternate II applies.
- (5) Workplaces under grants, for grantees other than individuals, need to be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (6) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).
- (7) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
- (8) Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

**Controlled substance** means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

**Conviction** means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

*Criminal drug statute* means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

*Employee* means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

### ***Certification Regarding Drug-Free Workplace Requirements***

#### **Alternate I. (Grantees Other Than Individuals)**

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about - -
  - (1) The dangers of drug abuse in the workplace;
  - (2) The grantee's policy of maintaining a drug-free workplace;
  - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will - -
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within 10 calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - -



- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code) **[Narrative, 2500 characters]**

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

☐ By checking this box, the State CSBG authorized official is providing the certification set out above.

### 15.3 Debarment

#### ***CERTIFICATION REGARDING DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS***

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -

Primary Covered Transactions

Instructions for Certification

- (1) By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
- (2) The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- (3) The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
- (4) The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.
- (7) The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusive-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows

that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

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#### ***Certification Regarding Debarment, Suspension, and Other Responsibility Matters - -***

##### **Primary Covered Transactions**

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
  - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
  - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

##### ***Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions***

##### **Instructions for Certification**

- (1) By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
- (2) The certification in this clause is a material representation of fact upon which reliance was

- (3) placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
- (4) The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
- (5) The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- (6) The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
- (7) The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (8) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.
- (9) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (10) Except for transactions authorized under paragraph five of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

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*Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - - Lower Tier Covered Transactions*

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

☐ By checking this box, the State CSBG authorized official is providing the certification set out above.

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#### 15.4 Environmental Tobacco Smoke

Public Law 103227, Part C Environmental Tobacco Smoke, also known as the Pro Children Act of 1994, requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity by signing and submitting this application the applicant/grantee certifies that it will comply with the requirements of the Act.

The applicant/grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for the children's services and that all subgrantees shall certify accordingly.

☐ By checking this box, the State CSBG authorized official is providing the certification set out above.